

## **REMARKS/ARGUMENTS**

Reexamination of the captioned application is respectfully requested.

### **A. SUMMARY OF THIS RESPONSE**

By the current response, Applicants basically:

1. Editorially amend claims 5 – 6, 15, 58 – 59, 68 – 69, and 71.
2. Thank the Examiner for the indication of allowable subject matter in claims 7-14, 17, 19, 46-49, 52-53, 60-65, 70 and 72 .
3. Respectfully traverse all prior art rejections.
4. Advise the Examiner of the simultaneous filing of a Petition to Extend.

### **B. PATENTABILITY OF THE CLAIMS**

Claims 1-3, 5-6, 15-16, 18, 42-44, 50-51, 54-56, 66-69, 71 and 87-92 stand rejected under 35 USC §103(a) as being unpatentable over WO 98/30056 to Salmela in view of U.S. Patent 6,334,052 to Nordstrand et al. Claims 4, 45 and 57 stand rejected under 35 USC §103(a) as being unpatentable over WO 98/30056 to Salmela in view of U.S. Patent 6,334,052 to Nordstrand et al and further in view of U.S. Publication 2003/0003909 to Keronen et al. All prior art rejections are respectfully but vigorously traversed for at least the following reasons.

WO 98/30056 to Salmela and U.S. Patent 6,334,052 to Nordstrand et al. essentially describe well known methods of selecting areas based on list of cells or service areas which are sent to a user equipment unit. One aspect or advantage of applicant's technology is that sending of such cell-related information is avoided, since the cell-related information is cumbersome. Moreover, such lists of cells have to be sent to the mobile as the mobile travels around, since the cell information can become obsolete (with the result that new cells have to be forwarded to the UE). This transmission and/or forwarding of cell lists requires much administration on the network

side. In a system such as that of WO 98/30056 to Salmela or U.S. Patent 6,334,052 to Nordstrand et al., the network has to store in its database which user equipment units (UEs) can access which cells in different parts of the network, so that when the UE accesses the network or performs a location update it can send this information to the UE. That connection between the UE and list of cells must, by necessity, change as the UE moves around.

Applicants technology clearly avoids the shortcomings of the prior art. In Applicants' technology, the UE does not need a list of cells, it just needs to know to which Group it belongs. Then, as the UE moves around the network, the UE can read from each cell which groups are allowed in that cell, and access or not access accordingly. (Of course the groups that the subscriber belongs to can change in different geographical areas, but does not have to). Applicant's technology thus leads to a more efficient and economical administration than any prior art method in which a subscriber is sent a list of cells.

The prior art rejections of the independent claims are manifestly deficient. For example, contrary to the intimations of the office action, WO 98/30056 to Salmela does not teach an access group eligibility message. Rather, WO 98/30056 to Salmela has a special services message which specifies which services are applicable in the cell. Salmela does not have a message which specifies which subscriber groups are accessible.

The office action correctly admits (and this is important, because in a number of later claims, it seems to forget this) that Salmela does fails to disclose an access group classification message.

The office action asserts that U.S. Patent 6,334,052 to Nordstrand et al. (particularly lines 6-50) teaches an access group classification. But in fact Nordstrand

does not. Rather, Nordstrand uses a list of cells or SAs that the user equipment unit (UE) can access...NOT what subscriber group the UE belongs to. A list of cells or SAs that a UE is allowed to access cannot be construed as an access group classification. Therefore the rejection of the independent claims is incorrect.

Concerning dependent claims such as dependent claim 2, the office action alleges that Nordstrand and Salmela further teach an access group eligibility message indicates what subscriber groups are eligible to operate in the cell for which the access group eligibility message is transmitted (the office action cites Salmela, abstract, p. 4, lines 2-30; page 5, line 14 to page 6 line 20). The office action does not refer to a specific part of Nordstrand to support this allegation. Applicants submit that Nordstrand does not defeat dependent claim 2, nor do any of the cited passages of Salmela:

- (1) There is no basis for the allegation in Salmela's abstract.
- (2) Salmela page 4 lines 2-30 relates to "special cells sent to the UE", not a broadcast access group eligibility message.
- (3) Salmela page 4 line 14 to page 6 line 20 refers to comparing the special cells stored in the mobile with the cells broadcast, not an access group eligibility message indicating which subscriber groups are allowed to operate.

In view of the deficiencies of the prior art rejections of the independent claims, all independent claims are deemed allowable over the applied prior art. The allowability of the independent claims renders the dependent claims allowable as well. Various dependent claims have separate bases of patentable significance. For now Applicants mentioned only a few of such claims, reserving the right should such be necessary for a fuller explanation of patentable merit of yet other dependent claims.

Regarding claim 5 and comparable other dependent claims, Applicants stress that Nordstrand has a list of cells sent to the mobile, not subscriber access groups as the office action alleges. Moreover, as explained above, Salmela does not describe an access group eligibility message. The office action alleges that Salmela generates an access group, citing see Salmela, abstract p4, lines 2-30; page 5, line 14 to page 6 line 20. This allegation is in contradiction to the office action previously and correct admission that Salmela does not advise the UE as to which of the plural access groups it belongs to.

Regarding dependent claim 6 and comparable claims, neither Nordstrand nor Salmela teach the UE sorting an access group classification message. In both references only a list of cells or service areas are stored in the UE

Contrary to the allegation of the office action and concerning dependent claim 16 and comparable claims, there is no mention of a version field at all in Nordstrand.

Commenting only briefly on the tertiary reference, Keronen merely broadcasts a list of service providers in a cell, and not which access groups are eligible to access that cell. Therefore, Keronen cannot salvage the flawed prior art rejections.

In view of the foregoing and other considerations, the Examiner has ample bases for withdrawing all rejections and for allowance of all pending claims. Accordingly, a formal indication of allowance is earnestly solicited.

### **C. MISCELLANEOUS**

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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